
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Cathy L. Waldor
:
v. : Mag. No. 21-9228
:
QI CUN HUANG : **CRIMINAL COMPLAINT**
:

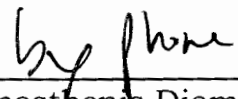
I, Special Agent Dimosthenis Diamantis, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Internal Revenue Service-Criminal Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B


Continued on the attached page and made a part hereof:



Dimosthenis Diamantis
Special Agent
IRS-Criminal Investigation

Special Agent Dimosthenis Diamantis attested to this Complaint by telephone pursuant to Fed. R. Crim. P. 4.1(b)(2)(A), on May ____, 2021.

HONORABLE CATHY L. WALDOR
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Conducting an Unlicensed Money Transmitting Business)

From in or around January 2016, through in or around May 2021, in the District of New Jersey, and elsewhere, the Defendant,

QI CUN HUANG,

knowingly conducted, controlled, managed, supervised, directed, and owned part and all of an unlicensed money transmitting business, and aided and abetted the conduct, control, management, supervision, direction, and ownership of such a money transmitting business, which business affected interstate and foreign commerce, and: (a) was a business operated without an appropriate money transmitting license in a state where such operation is punishable as a misdemeanor or a felony under state law, that is, the State of New Jersey, State of New York, and State of Pennsylvania; and (b) was a business required to register with the Financial Crimes Enforcement Network ("FinCEN"), an agency of the United States government, pursuant to Section 5330 of Title 31, United States Code.

In violation of Title 18, United State Code, Sections 1960(a), (b)(1)(A), (b)(1)(B), and 2.

ATTACHMENT B

I, Dimosthenis Diamantis, am a Special Agent with the Internal Revenue Service-Criminal Investigation ("IRS-CI"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and other items of evidence. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where statements of others are related herein, they are related in substance and part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. The U.S. Drug Enforcement Administration ("DEA") and IRS-CI have been investigating a large-scale, unlicensed money transmitting business ("MTB") operating in New Jersey, New York, Pennsylvania, and elsewhere. The investigation has revealed that Da Ying Sze ("Sze"), Yunqin Liu ("Liu"), Yufeng Gao ("Gao"), Francisco Rodriguez ("Rodriguez"), Fai Ngai ("Ngai"), Xiumei Lin ("Lin"), and Qi Cun Huang ("Huang") conducted, controlled, managed, supervised, directed, and owned the MTB and aided and abetted its activities. Law enforcement has also identified Queens Sewing 43 Inc ("Queens Sewing"), Asia Sewing Corp ("Asia Sewing"), Asia Apparel USA Corp ("Asia Apparel"), Asia Clothing Wholesale Corp ("Asia Clothing"), Broadway Fashion USA Corp ("Broadway Fashion"), Fai Trading NYC Corp ("Fai Trading"), and Mei Sewing Corp ("Mei Sewing") as entities controlled by or connected to the MTB and used in furtherance of the MTB's activities. In all, law enforcement has identified more than approximately \$500 million in financial transactions in which cash was deposited or used to purchase negotiable instruments using bank accounts controlled by or connected to the MTB.

2. Over the course of the investigation, law enforcement conducted extensive analysis of evidence provided by financial institutions concerning bank accounts controlled by the MTB. Law enforcement learned that from in or around January 2016 through in or around April 2021, bank accounts held by entities and individuals linked to the MTB showed a frequent pattern of large, round-dollar deposits of cash at various financial institutions and branch locations in New Jersey, New York, Pennsylvania, and elsewhere. Many of the individual deposits were in the tens of thousands of dollars, and some of the daily deposits totaled more than several million dollars.

3. During the investigation, law enforcement learned that Huang controlled Asia Clothing. In addition, law enforcement learned that Huang used Asia Clothing and a bank account connected to Asia Clothing in furtherance of the MTB. For example, based on a review of financial records, law enforcement identified the following representative cash deposits involving Asia Clothing,

Huang, and other entities and individuals linked to the MTB, which involved individual deposits in New Jersey, New York, and Pennsylvania:¹

- a. On or about September 10, 2020, members of the MTB engaged in financial transactions in the amount of approximately \$664,270 using accounts linked to Asia Clothing and Huang.
- b. On or about August 25, 2020, members of the MTB engaged in financial transactions in the amount of approximately \$2,205,010 using accounts linked to Asia Clothing, Huang, Queens Sewing, and Liu.
- c. On or about August 17, 2020, members of the MTB engaged in financial transactions in the amount of approximately \$1,817,190 using accounts linked to Asia Clothing and Huang.

4. On or about May 7, 2021, law enforcement approached Huang and another individual ("Individual-1") in or around Queens, New York. After Huang was Mirandized, he admitted that he owned Asia Clothing; opened a bank account associated with Asia Clothing; and, along with Sze, moved more than approximately \$91 million through the bank account. In addition, Huang explained that on or about May 7, 2021, he had taken a bus from Pennsylvania to New York for the purpose of bringing Sze approximately \$220,000 in cash, which law enforcement seized. Huang further explained to law enforcement that for his services, he received approximately \$10 per \$10,000 in cash that he moved.

5. At all times relevant to this Complaint, none of the entities or individuals involved in the MTB—including Queens Sewing, Asia Sewing, Asia Apparel, Asia Clothing, Broadway Fashion, Fai Trading, Mei Sewing, Sze, Liu, Gao, Rodriguez, Ngai, Lin, and Huang—were registered as a money service business in New Jersey, New York, Pennsylvania, or with FinCEN.

¹ The below-referenced dates are approximate. At times, financial transactions that occur on the weekends or after the financial institution closes for the day may post on the next business day.